REMARKS/ARGUMENTS

1. Introduction

The independent claims were rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by Kaaresoja et al. Applicants have amended the claims to more clearly distinguish the present invention from the cited prior art.

2. Claim 1

Claim 1 defines a method including, *inter alia*, receiving an input signal associated with an actuation of one of a plurality of user-interface members on a first handheld communication device; assigning a haptic code associated with the actuation; including the haptic code in an output signal; and sending the output signal from a second handheld communication device remote from the first handheld communication device, with said actuation occurring in response to said haptic code being received by the first handheld device.

Kaaresoja et al. does not teach these features, because Kaaresoja et al. teaches a single motor used to produce various kinds of vibration patterns. See col. 4, lines 17-19. This becomes salient by Kaaresoja et al. advocating that the vibration patterns may be sensed by a user wearing a wristband. See col. 6, lines 38-49. As a result, Kaaresoja et al. teaches having a user of a handheld device perceiving haptic messages independent of the regions of the handheld device that the user is touching. This is distinguishable from the claimed invention in which an input signal associated with an actuation of one of a plurality of user-interface members on a first handheld communication device is received. Applicants advocate this feature facilitate perception of haptic messages based upon the region of the handheld device that a user is touching. See ¶ [0037]. This is opposite to the teachings of Kaaresoja et al. As a result,

Applicants contend that claim 1, as amended, is not anticipated by Kaaresoja et al. Furthermore, a *prima facie* case of obvious is not present with respect to amended claim 1.

3. Claim 6

Claim 6 defines a method including, *inter alia*, providing a perceivable stimuli by a user of the first handheld communication device, with the stimuli identifying a subset of the plurality of user-interface members; and providing a control signal to an actuator to generate a haptic effect associated with the input signal in response to the user touching the subset. Applicants contend that the arguments set forth above with respect to claim 1 apply with equal weight here, because the stimuli identifies a subset of the plurality of user-interface members. These features facilitate perception of haptic messages based upon the region of the handheld device that a user is touching. See ¶ [0037]

In addition claim 6 recite additional features that distinguish the claimed method from the cited prior art. Specifically, claim 6 further defines the method as including, *inter alia*, providing a control signal to an actuator to generate a haptic effect associated with the input signal in response to the user touching the subset of the plurality of user-interface members. See ¶ [0037] Specifically, the haptic effect associated with the input signal does not occur upon receipt of the input signal. Rather the haptic effect occurs after a user touches the subset. Thus, there may be a delay between receipt of a signal indicating that a haptic effect is to be generated and the actual generation of the haptic effect. This is clearly absent from the cited prior art. Based upon the foregoing, Applicants contend that claim 6, as amended, is not anticipated by Kaaresoja et al. Furthermore, a *prima facie* case of obvious is not present with respect to amended claim 6.

4. Claim 10

Claim 10 defines a computer-readable medium on which is encoded program code that includes, *inter alia*, program code for receiving an input signal associated with an actuation of one of a plurality of user-interface members on a first handheld communication device; program code for assigning a haptic code associated with the actuation; program code for including the haptic code in an output signal; and program code for sending the output signal from a second handheld communication device remote from the first handheld communication device, with said actuation occurring in response to said haptic code. It is submitted that the arguments set forth above with respect to claim 1 apply with equal weight here. Therefore, amended claim 10 defines an invention suitable for patent protection.

5. Claim 19

Claim 19 defines a handheld device that includes, *inter alia*, a plurality of user-interface members; a processor in data communication with the user-interface member; an actuator coupled to the a subset of the plurality of user-interface members and in data communication with the processor; and a memory in data communication with a processor, the memory storing program code executable by the processor, including program code for producing a haptic stimuli with the subset. It is submitted that the arguments set forth above with respect to claim 1 apply with equal weight here. Therefore, amended claim 19 defines an invention suitable for patent protection.

6. Claim 26

Claim 26 defines a handheld communication device that includes, *inter alia*, a user-interface member coupled to the body a processor in data communication with the user-interface member; an actuator coupled to the user-interface member and in data communication with the processor; and a memory in data communication with the processor, the memory storing program code executable by the processor, including program code for receiving an input signal; program code for outputting a request from the handheld communication device providing a perceivable stimuli by a user of the second handheld communication device, with the stimuli indicating that said user is to touch the user-interface member; andprogram code for providing a control signal to cause the actuator to produce a haptic stimuli using the user-interface member. It is submitted that the arguments set forth above with respect to claim 1 apply with equal weight here. Therefore, amended claim 26 defines an invention suitable for patent protection.

6. Dependent Claims

Considering the dependent claims include all of the features of the independent claims from which they depend, the dependent claims are patentable to the extent that the independent claims are patentable. As a result, Applicants respectfully contend that a *prima facie* case of neither anticipation nor obviousness is present with respect to the dependent claims for the reasons set forth above with respect to the independent claims.

7. Relief Requested

It is respectfully requested that the claims be examined and in view of the amendments and remarks made above. A notice of allowance is earnestly solicited. If the Examiner has any

questions or needs any additional information, the Examiner is invited to contact the undersigned.

If, in the opinion of the Examiner, an interview would expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at the number indicated below. Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Please charge any additional required fee or credit any overpayment not otherwise paid or credited to our deposit account No. 50-1698.

Respectfully submitted,

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Dated: 12 December 2007

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